

**CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**InterArt Distribution
1145 Sunrise Greetings Court
Bloomington, Indiana 47402**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 105-12296-00004	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emissions units and Pollution Control Equipment Summary

B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]
- B.5 Modification to Permit [326 IAC 2]
- B.6 Minor Source Operating Permit [326 IAC 2-6.1]

C SOURCE OPERATION CONDITIONS

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
- C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- C.6 Permit Revocation [326 IAC 2-1-9]
- C.7 Opacity [326 IAC 5-1]
- C.8 Fugitive Dust Emissions [326 IAC 6-4]
- C.9 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Testing Requirements

- C.10 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements

- C.11 Compliance Monitoring [326 IAC 2-1.1-11]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.18 Annual Notification [326 IAC 2-6.1-5(a)(5)]

D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

- D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]
- D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]
- D.1.3 Testing Requirements [326 IAC 2-1. 1-11]

Compliance Determination Requirements

Compliance Monitoring Requirements

Record Keeping and Reporting Requirements

**Annual Notification
Malfunction Report**

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary source that prints and binds greeting cards and books.

Authorized Individual:	Marc Sattinger
Source Address:	1145 Sunrise Greetings Court, Bloomington, Indiana 47402
Mailing Address:	Post Office Box 4699, Bloomington, Indiana 47402
Phone Number:	(812) 336-9900
SIC Code:	2732
County Location:	Monroe
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Three (3) infrared dryer offset lithographic printing presses, identified as Komori A, Komori C and Komori M, each with a maximum line speed of 504 feet per minute and a maximum printing width of forty (40) inches, and exhausting to stacks K-A, K-C and K-M, respectively.
- (b) Three (3) infrared dryer offset lithographic printing presses, identified as SORD, 102Z, and the South Building Press, each with a maximum line speed of 350 feet per minute and a maximum printing width of forty (40) inches, and each exhausting inside the building.
- (c) One (1) vinyl acetate lid making machine exhausting inside the building.
- (d) Thirty-five (35) natural gas space heaters, rated a total of 5.3 Million British Thermal Units (MMBtu).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan to be submitted by the permittee to IDEM.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.18 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) infrared dryer offset lithographic printing presses, identified as Komori A, Komori C and Komori M, each with a maximum line speed of 504 feet per minute and a maximum printing width of forty (40) inches, and exhausting to stacks K-A, K-C and K-M, respectively.
- (b) Three (3) infrared dryer offset lithographic printing presses, identified as SORD, 102Z, and the South Building Press, each with a maximum line speed of 350 feet per minute and a maximum printing width of forty (40) inches, and each exhausting inside the building.
- (c) One (1) vinyl acetate lid making machine exhausting inside the building.
- (d) Thirty-five (35) natural gas space heaters, rated a total of 5.3 Million British Thermal Units (MMBtu).

Emission Limitations and Standards

D.1.1 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

- (1) The infrared dryer offset lithographic presses are not subject to the requirements of the New Source Performance Standards (NSPS), 326 IAC 12, (40 CFR 63.820, Subpart QQ) because the rule applies only to publication rotogravure printing presses.

D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from each press to twenty-five tons per year or more, shall obtain prior approval from IDEM, OAM and shall be subject to the requirements of 326 IAC 8-1-6.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable compliance monitoring requirements for this emissions unit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable recordkeeping or reporting requirements for this emissions unit.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	InterArt Distribution
Source Location:	1145 Sunrise Greetings Court, Bloomington, IA 47402
County:	Monroe
SIC Code:	2732
Operation Permit No.:	105-12296-00004
Permit Reviewer:	ERG/KM

The Office of Air Management (OAM) has reviewed a revision application from InterArt Distribution relating to the operation of a greeting card and book printing and binding operation.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) Three (3) infrared dryer offset lithographic printing presses, identified as Komori A, Komori C and Komori M, each with a maximum line speed of 504 feet per minute and a maximum printing width of forty (40) inches, and exhausting to stacks K-A, K-C, and K-M, respectively.
- (b) Three (3) infrared dryer offset lithographic printing presses, identified as SORD, 102Z and the South Building Press, each with a maximum line speed of 350 feet per minute and a maximum printing width of forty (40) inches, and each exhausting inside the building.
- (c) One (1) vinyl acetate lid making machine exhausting inside the building.
- (d) Thirty-five (35) natural gas space heaters, rated a total of 5.3 million British Thermal Units (MMBtu).

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 17, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, (pages 1-10).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.18
PM-10	0.18
SO ₂	0.01
VOC	62.62
CO	1.94
NO _x	2.30

HAP's	Potential To Emit (tons/year)
Benzene	4.84E-05
Cadmium	2.54E-05
Chromium	3.23E-05
Dichlorobenzene	2.77E-05
Ethyl benzene	0.48
Formaldehyde	1.73E-03
Glycol ethers	9.26
Hexane	0.042
Isopropylbenzene	0.02
Lead	1.15E-05
Manganese	8.76E-06
Nickel	4.84E-05
Toluene	7.84E-05
Xylene	2.42
HAP Total	12.22

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each criteria pollutant is less than one hundred (100) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from this source.

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Monroe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Monroe County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.18
PM10	0.18
SO ₂	0.01
VOC	62.62
CO	1.44
NO _x	2.3
Single HAP	9.26
Combination HAPs	12.22

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) Each criteria pollutant is less than 100 tons per year,
- (b) A single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) Any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) The infrared dryer offset lithographic presses are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 63.820, Subpart QQ) because Subpart QQ applies only to publication rotogravure printing presses and does not address lithographic presses and no other NSPS (326 IAC 12 and 40 CFR Part 60) are applicable to this source.
- (b) The infrared dryer offset lithographic presses are not subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63.430, Subpart KK) because Subpart KK applies only to publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and does not address lithographic presses and no other NESHAPs (326 IAC 14 and 40 CFR Part 63) are applicable to this source.

State Rule Applicability - Entire Source

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of a source at or near ground level must be made by a qualified representative of IDEM [326 IAC 6-4-5(c)].

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

Pursuant to this rule, the permittee shall control PM emissions at the source according to the control plan required in 326 IAC 6-5-3, to be submitted by the permittee to IDEM.

State Rule Applicability - Individual Facilities

There are no State rules specifically applicable to individual facilities.

326 IAC 2-4.1 (Major Sources of Hazardous Pollutants)

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

- (a) A single hazardous pollutant (HAP) is less than 10 tons per year, and
- (b) Any combination of HAPs is less than 25 tons per year.

326 IAC 8-1-6 (New facilities; general reduction requirements)

This source is not subject to the requirements of 326 IAC 8-1-6 because the potential to emit (PTE) VOC from each printing press is less than 25 tons per year.

326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Operations)

This source is not subject to the requirements of 326 IAC 8-5-5 because this rule applies only to packaging rotogravure, publication rotogravure, and flexographic printing sources and this source uses only offset lithographic printing presses.

Conclusion

The operation of this greeting card and book printing and binding operation shall be subject to the conditions of the attached proposed Construction and Minor Source Operating Permit 105-12296-00004.

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Komori A	504	40	127153

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.125	8%	100.00%	127153	0.64
Aqua Etch	0.031	0%	100.00%	127153	0.00
Enhance 603	0.047	75%	100.00%	127153	2.24

Total VOC Emissions from Ink=	2.88 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.18	33%	100.00%	0.26
Meter Roller Cleaner	0.028	43%	100.00%	0.05
Calcium Rinse	0.11	0%	100.00%	0.00
Chrome Conditioner	0.03	0%	100.00%	0.00
Clean Down 2 WM	0.14	100%	100.00%	0.61
3047-F Coating	3.6	10%	100.00%	1.58
3060 Coating	3.6	10%	100.00%	1.58
Aqua Drier	0.052	80%	100.00%	0.18
Isopropyl Alcohol	1.74	100%	100.00%	7.62

Total VOC Emissions from Other Materials=	11.88 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	14.76	Ton/yr
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METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Komori C	504	40	127153

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.125	8%	100.00%	127153	0.64
Aqua Etch	0.031	0%	100.00%	127153	0.00
Enhance 603	0.047	75%	100.00%	127153	2.24

Total VOC Emissions from Ink=	2.88 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.18	33%	100.00%	0.26
Meter Roller Cleaner	0.028	43%	100.00%	0.05
Calcium Rinse	0.11	0%	100.00%	0.00
Chrome Conditioner	0.03	0%	100.00%	0.00
Clean Down 2 WM	0.14	100%	100.00%	0.61
3047-F Coating	3.6	10%	100.00%	1.58
3056 N-3 Coating	3.6	1%	100.00%	0.19
Aqua Drier	0.052	80%	100.00%	0.18
Isopropyl Alcohol	1.74	100%	100.00%	7.62

Total VOC Emissions from Other Materials=	10.50 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	13.37	Ton/yr
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METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Komori M	504	40	127153

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.125	8%	100.00%	127153	0.64
Aqua Etch	0.031	0%	100.00%	127153	0.00
Enhance 603	0.047	75%	100.00%	127153	2.24

Total VOC Emissions from Ink=	2.88 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.18	33%	100.00%	0.26
Calcium Rinse	0.11	0%	100.00%	0.00
Clean Down 2 WM	0.14	100%	100.00%	0.61
GI Blanket Wash	0.15	98%	100.00%	0.64
Aqua Drier	0.052	80%	100.00%	0.18
Isopropyl Alcohol	1.74	100%	100.00%	7.62

from Other Materials=	9.32 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	12.20	Ton/yr
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METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
SORD	350	40	88301

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.012	8%	100.00%	88301	0.04

Total VOC Emissions from Ink=	0.04 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.04	33%	100.00%	0.06
Clean Down 2 WM	0.04	100%	100.00%	0.18
GI Blanket Wash	0.083	98%	100.00%	0.36
Scratch Remover	0.0053	27%	100.00%	0.01

from Other Materials=	0.60 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	0.64	Ton/yr
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METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
102z	350	40	88301

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.012	8%	100.00%	88301	0.04

Total VOC Emissions from Ink=	0.04 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.04	33%	100.00%	0.06
Clean Down 2 WM	0.04	100%	100.00%	0.18
GI Blanket Wash	0.083	98%	100.00%	0.36
Scratch Remover	0.0053	27%	100.00%	0.01

Total VOC Emissions from Other Materials=	0.60 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	0.64	Ton/yr
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METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
South Building Press	350	40	88301

INK VOCS					
Ink Name	Maxium Coverage	Weight % Volatiles*	Flash Off %	Throughput	Emissions
Press Id	'(lbs/MMin^2)			(MMin^2/Year)	(TONS/YEAR)
Aqua Tech Ink	0.012	8%	100.00%	88301	0.04

Total VOC Emissions from Ink=	0.04 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Clean Down 1	0.04	33%	100.00%	0.06
Clean Down 2 WM	0.04	100%	100.00%	0.18
GI Blanket Wash	0.083	98%	100.00%	0.36
Scratch Remover	0.0053	27%	100.00%	0.01

Total VOC Emissions from Other Materials=	0.60 Ton/yr
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

TOTAL VOC EMISSIONS:	0.64	Ton/yr
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METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

For materials that are not used on paper (i.e., cleaning products), use rmaximum raw material throughput in tons per year.

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations**VOC From Acetate Lid Making Process**

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Pit ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

OTHER MATERIALS VOCS				
Material Name	Maximum Throughput	Weight % Volatiles*	Flash Off %	Emissions
Press Id	'(lbs/hr)			(TONS/YEAR)
Super X Solvent	4.62	100%	100.00%	20.24

Total VOC Emissions=	20.24
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*VOC (Tons/Year) = Maximum Throughput tons per year * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off

Appendix A: Emissions Calculations
VOC From Acetate Lid Making Process

Page 8 of 9 TSD AppA

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Pit ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

Material	Amount Used (lb/hour)						
	Komori A	Komori C	Komori M	SORD	102z	South Building Press	Acetate Lid Making
Aqua Etch	0.45	0.45	0.45	0	0	0	0
Enhance 603	0.68	0.68	0.68	0	0	0	0
Meter Roller Cleaner	0.028	0.028	0	0	0	0	0
Aqua Drier	0.052	0.052	0.052	0	0	0	0
3047 Coating	3.6	3.6	0	0	0	0	0
3060 Coating	3.6	0	0	0	0	0	0
GI Blanket Wash	0	0	0.15	0.083	0.083	0.083	0
Super X Solvent	0	0	0	0	0	0	4.62

HAP*	CAS No.	Material	Volume % (gal/unit)	Density (lb/gal)	Weight %
Ethylbenzene	100-41-4	Super X Solvent	2.40%	7.24	2.35%
Ethylene Glycol Monobutyl Ether	111-76-2	GI Blanket Wash	12.00%	7.52	12.89%
Isopropylbenzene	98-82-9	GI Blanket Wash	1.30%	7.19	1.34%
Xylene	1330-20-7	GI Blanket Wash	3.10%	7.21	3.19%
Xylene	1330-20-7	Super X Solvent	12.00%	7.21	11.71%

* The amount of HAP in Super X Solvent and GI Blanket Wash were given in a percent by volume. In order to complete HAP emissions, these volume percents must be converted to percent by weight. All other materials were given in percent by weight directly.

Material	Density (lb/gal)	Maximum (ton/yr)	Weight % Ethylbenzene	Weight % Isopropylbenzene	Weight % Xylene	Weight % Glycol Ethers	Ethylbenzene Emissions (ton/yr)	Isopropylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Aqua Etch	9.76	5.91	0.00%	0.00%	0.00%	20.00%	0.00	0.00	0.00	1.18
Enhance 603	7.96	8.94	0.00%	0.00%	0.00%	65.00%	0.00	0.00	0.00	5.81
Meter Roller Cleaner	7.65	0.25	0.00%	0.00%	0.00%	30.00%	0.00	0.00	0.00	0.07
Aqua Drier	8.06	0.68	0.00%	0.00%	0.00%	80.00%	0.00	0.00	0.00	0.55
3047 Coating	8.60	31.54	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.95
3060 Coating	8.60	15.77	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.47
GI Blanket Wash	7.00	1.75	0.00%	1.34%	3.19%	13.00%	0.00	0.02	0.06	0.23
Super X Solvent	7.39	20.24	2.35%	0.00%	11.71%	0.00%	0.48	0.00	2.37	0.00

Total State Potential Emissions: 0.48 0.02 2.42 9.26

METHODOLOGY **TOTAL: 12.18**

HAPS emission rate (tons/yr) = Maximum throughput (lb/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Hapcalc.wk4 9/95

Appendix A: Emissions Calculations

Page 9 of 9 TSD App A

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: InterArt Distribution
Address City IN Zip: 1145 Sunrise Greetings Court, Bloomington, IN 47402-4045
CP: MSOP 105-12296
Plt ID: 00004
Reviewer: ERG/KM
Date: 06/08/2000

Heat Input Capacity
MMBtu/hr

5.3

Potential Throughput
MMCF/yr

46.1

Criteria Pollutant Emissions:

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.18	0.18	0.01	2.30	0.13	1.94

*PM and PM10 emission factors are filterable and condensable combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

HAP Emissions:

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.840E-05	2.766E-05	1.729E-03	4.149E-02	7.836E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.152E-05	2.535E-05	3.227E-05	8.758E-06	4.840E-05

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

All emission factors are based on normal firing. MMBtu = 1,000,000 Btu, 'MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. '(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton